

# Supplier Code of Conduct

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Treating all workers with respect and dignity, ensuring safe working conditions, and conducting environmentally responsible and ethical operations are of paramount importance to VeriFone, Inc., and its subsidiaries worldwide (collectively, “**Verifone**,” “**we**,” or “**our**”). We expect service providers, vendors, and suppliers (collectively, “**Suppliers**”) in our operations and supply chain, and their suppliers, to comply with all applicable laws, legal regulations, directives, and guidelines, as well as with all obligations in any contracts Suppliers may have with us, and to adopt appropriate practices in accordance with the principles set forth in this Supplier Code of Conduct (“**Supplier Code**”).

This Supplier Code is based on the framework of the Responsible Business Alliance Code of Conduct.

# Business Ethics

Verifone prides itself on our solid reputation for honesty, integrity, and ethical dealings. To help maintain that reputation, Suppliers shall comply with all applicable laws and regulations and uphold the highest standards of ethics to promote honesty and integrity in business operations, including:

- Business Integrity: Supplier shall uphold the highest standards of integrity in business interactions with Verifone and maintain accurate books and records regarding all transactions with and on behalf of Verifone and our products and services. Supplier shall implement monitoring procedures to identify and prevent criminal activity in business transactions, including, but not limited to, extortion, embezzlement, money laundering, and fraud.
- Anti-Corruption and Anti-Bribery: Supplier shall comply with all applicable anti-corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and other applicable anti-corruption laws and international conventions. Bribes, kickbacks, facilitation payments or other means of obtaining an undue, illegal, or improper advantage may not be offered, promised, authorized, accepted, or given in the context of any Verifone transactions.
- Conflict of Interests: Supplier shall avoid entering into a financial or any other relationship with a Verifone officer, employee, or contingent worker that creates or gives the appearance of a conflict of interest. Even the appearance of a conflict of interest can be damaging to Verifone and to the Supplier. Any known real or potential conflict of interest must be promptly disclosed to Verifone for review.
- Improper Advantage: Supplier shall not offer a gift, benefit, or anything of value that might appear to improperly influence or compromise the judgment of Verifone or any Verifone officer, employee or contingent worker. Any gift or benefit must be permitted under all applicable laws and regulations, the Supplier's policies, this Supplier Code, and any other applicable Verifone policies. Verifone officers, employees, and contingent workers are strictly prohibited from receiving commissions in exchange for doing business with a supplier.
- Subcontractors and Due Diligence: If Supplier uses subcontractors, it shall conduct due diligence to ensure that the subcontractors are registered and legally qualified to conduct business in the relevant location, and are reputable businesses that obey all applicable laws. Supplier shall have robust risk-based internal controls for authorizing subcontractor payments and to prevent and detect violations of law.
- Responsible Sourcing: Supplier shall exercise due diligence to comply with applicable laws and regulations related to sourcing of materials. This includes, but is not limited to, regulations related to

conflict minerals (*e.g.*, tantalum, tin), toxic materials, and protected or endangered fish, plants, or wildlife. Supplier shall exercise due diligence on the source and chain of custody of materials and resources, as applicable, and accurately disclose its due diligence measures to Verifone upon request. Supplier shall also ensure that all materials incorporated into Verifone's products comply with applicable laws regarding eradication of forced labor, human trafficking, and slavery.

- Reporting Concerns and Non-Retaliation: Supplier shall maintain a program that provides workers with a means to report suspected or actual violations of law, Supplier's policies, Verifone policies, this Supplier Code or other ethical concerns or grievances anonymously without fear of retaliation against individuals who make reports in good faith, unless prohibited by law. Supplier shall also report suspected or actual violations of law, Verifone policies, this Supplier Code or other ethical concerns or grievances related to Verifone officers, employees, workers, contract personnel, or other suppliers. Any such concerns or misconduct noted by Supplier should be reported directly to Verifone's Compliance Department at the 24-Hour Compliance Line by telephone (888.719.1228) or online at <https://www.compliance-helpline.com/verifone.jsp>. Reports can be made anonymously in countries where that is permitted by law. Verifone prohibits retaliation against anyone raising concerns or reporting misconduct in good faith.
- Accurate Records: Business dealings should be performed transparently and be reflected accurately in Supplier's business books and records. When requested, Supplier shall accurately disclose information regarding its labor, health and safety, and environmental practices, business activities, structure, financial situation, and performance to Verifone in accordance with prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain is unacceptable.
- Protection of Intellectual Property and Confidential Information: Supplier shall respect intellectual property rights, safeguard Verifone's data and confidential information, and conduct technology and know-how transfers in a manner protecting intellectual property rights and confidential information from unauthorized disclosure.
- On-Site Work: Suppliers using our properties or facilities shall comply with all of our applicable policies and requirements.
- Privacy and Information Security: Supplier shall:
  - (i) comply with all applicable data protection laws, including but not limited to the General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA), and other relevant privacy legislation and industry standards.
  - (ii) Adhere to Verifone's policies and guidelines concerning the handling of personal data. If a Verifone policy conflicts with applicable law, promptly notify Verifone to resolve the conflict.

- (iii) implement and maintain appropriate technical and organizational measures to protect personal data against unauthorized access, disclosure, loss, or misuse. These measures must reflect industry best practices and applicable legal standards.
  - (iv) promptly report any suspected or actual data breaches or privacy-related incidents involving Verifone's data to the designated Verifone contact without undue delay.
  - (v) provide regular privacy and security training to all personnel engaged in Verifone-related activities. Training must cover confidentiality, data security, processing purposes, data subject rights, and compliance with applicable laws. Suppliers shall maintain records of training and provide these to Verifone upon request.
  - (vi) inform supplier personnel (employees, contractors, etc.) about Verifone's processing of their personal data in compliance with applicable laws. Suppliers may refer their personnel to Verifone's [Privacy Notice for Suppliers, Service Providers, and Visitors](#) for more information. Suppliers are responsible for determining the appropriate legal basis for sharing their personnel's data with Verifone and ensuring that such transfers are lawful, documented, and limited to what is necessary.
  - (vii) Where acting as a data processor on behalf of Verifone, ensure that any subcontractors or sub-processors are bound by equivalent privacy and security obligations. Suppliers remain fully responsible for their sub-processors' compliance.
- Use of Artificial Intelligence (AI): Supplier shall:
    - (i) ensure that any AI systems used in connection with the products or services provided to Verifone comply with all applicable laws and regulations, including those relating to data protection, non-discrimination, and ethical AI practices.
    - (ii) use AI systems in a transparent and explainable manner, particularly where decisions may affect individuals' rights or interests. Suppliers must identify and mitigate potential biases to avoid discriminatory outcomes or unfair treatment.
    - (iii) ensure that AI systems adhere to Verifone's privacy and information security requirements. Suppliers must employ data minimization practices, process only the data necessary for the intended purpose, and use secure methods for processing personal data.
    - (iv) refrain from using AI for unethical purposes, including unauthorized surveillance, profiling, or decision-making that infringes on individuals' privacy or rights.

- (v) monitor the performance and use of AI systems to ensure compliance with applicable laws and Verifone's standards. Promptly report to Verifone any risks, misuse, or incidents involving AI systems.
- (vi) not use Verifone's data or information to train AI systems or develop algorithms without Verifone's prior written approval. Any deployment of AI systems to deliver products or services to Verifone must be expressly agreed and documented in contractual terms.
- Fair Business, Advertising, and Competition: Supplier shall uphold standards of fair business, advertising, and competition and comply with applicable laws and regulations.

# Labor & Human Rights

Verifone is committed to upholding the human rights of workers and treating them with dignity and respect. This applies to all workers, including employees, temporary workers, contractors, and any other type of worker. We expect our Suppliers to share in this commitment and manage their own workforces in order to achieve the following results:

- Wages and Benefits: Supplier shall comply with applicable wage laws and regulations, including those relating to minimum wages, overtime hours, and legally mandated benefits. Deductions from wages should not be improperly used as a disciplinary measure, and workers should not be required to pay fees to secure or maintain employment. Supplier shall hire only workers authorized to work in accordance with applicable laws and regulations.
- Working Hours: Except in emergency or unusual situations, for Supplier's workers paid hourly, workweeks are expected not to exceed the lesser of 60 hours per week (including overtime) or the maximum permitted by local law. Workers should be allowed at least one day off every seven days.
- Non-Discrimination, Diversity, and Inclusion: Supplier shall commit to a workplace free of unlawful discrimination and should not discriminate against any worker on any unlawful basis. Supplier shall demonstrate a commitment to a culture of diversity and inclusion through all aspects of workplace management.
- Young Workers: Supplier shall not use child labor as defined by local law or under 16 years of age, whichever is greater, or under an older age if required for certain types of work. This does not prohibit legitimate workplace apprenticeship programs that comply with applicable laws and regulations. Workers under the age of 18 shall not engage in any occupation that is particularly hazardous for the employment of children under 18 or detrimental to their health or well-being.
- Fair Treatment and Anti-Harassment: Supplier shall commit to a workplace free of harassment and abuse. Supplier shall not subject workers to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, or verbal abuse.
- Freely Chosen Employment and Combating Modern Slavery: Supplier shall not use or permit any form of forced, bonded, indentured, indentured labor, or involuntary prison labor and shall not engage in slavery or trafficking of persons. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force coercion, abduction, or fraud. All work must be voluntary, and workers should be free to leave work or terminate their employment with reasonable notice. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to no

unreasonable restrictions on entering or exiting company-provided facilities. Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment.

- Freedom of Association and Collective Bargaining: As permitted by applicable laws and regulations, the rights of workers to associate freely, form and join workers' organizations, seek representation, and bargain collectively should be respected. Suppliers are expected to permit workers to openly communicate and share grievances with management about working conditions without fear of reprisal or harassment.

# Health & Safety

In addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services. Suppliers shall comply with all applicable occupational health and safety laws and regulations and shall integrate the following health and safety management requirements into business processes to provide workers with a healthy and safe work environment:

- Occupational Safety and Health: Supplier shall identify, evaluate, and manage potential safety and health hazards (*e.g.*, electrical, and other energy sources, fire, vehicles, and fall hazards) through safe work procedures, preventative maintenance, protective measures, and training. Supplier shall provide workers with appropriate personal protective equipment in situations where hazards cannot be adequately controlled.
- Emergency Preparedness: Supplier shall identify, evaluate, and manage potential emergency situations and implement appropriate emergency plans and response procedures, such as emergency reporting, evacuation procedures, fire detection and suppression, training, and recovery. Such plans and procedures should focus on minimizing harm to life, the environment, and property.
- Occupational Injury and Illness: Supplier shall establish procedures to prevent, manage, track, and mitigate occupational injury and illness, including provisions to encourage reporting, provide necessary medical treatment, investigate cases, and implement corrective actions.
- Industrial Hygiene: Supplier shall identify, evaluate, and manage worker exposure to hazardous, chemical, biological, and physical agents. Controls should be in place to prevent overexposure, including to excessive noise levels, and, when necessary, workers should be provided with appropriate personal protective equipment.
- Machine Safeguarding: Supplier shall evaluate production and other machinery for safety hazards. Physical guards, interlocks, and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.
- Physically Demanding Work: Supplier shall identify, evaluate, and manage worker exposure to physically demanding tasks, including manual material handling, heavy lifting, prolonged standing, and highly repetitive or forceful assembly tasks.

- Sanitation, Food, and Housing: Supplier shall provide workers with reasonable access to clean toilet facilities and potable water. Supplier-provided food preparation, storage, and eating areas shall be sanitary. Dormitories or housing provided to workers by Supplier shall be clean and safe with adequate emergency egress, heat and ventilation, and reasonable personal space along with entry/exit access. Excessive fees for food or lodging shall not be charged to workers.
- Health and Safety Communication: Supplier shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand to identify workplace hazards that workers are exposed to, including, but not limited to, mechanical, electrical, chemical, fire, and physical hazards.

# Environment

Verifone recognizes that environmental responsibility is integral to producing world-class products. We expect Suppliers to comply with applicable environmental laws and regulations to minimize adverse effects on the community, environment, and national resources while safeguarding the health and safety of the public. In addition:

- Environmental Permits and Reporting: Supplier shall obtain, maintain, and keep all environmental permits (*e.g.*, discharge monitoring) and registrations, as required by applicable law or regulation, and follow operational and reporting requirements of such permits.
- Hazardous Substances: Supplier shall identify and manage substances that pose a hazard if released into the environment to ensure safe handling, movement, storage, recycling, reuse, and disposal. Supplier shall comply with applicable labeling laws and regulations for recycling and disposal. Supplier shall identify and manage chemicals and other materials that pose a hazard to the environment to ensure their safe handling, use, storage, and disposal. Supplier shall identify, monitor, control, treat, and reduce hazardous air emissions, wastewater, and waste generated from its operations.
- Solid Waste Emissions: Supplier shall monitor, control, and treat solid waste generated from operations, industrial processes, and sanitation facilities before discharge or disposal.
- Water Management: Supplier shall implement a water management program that documents, characterizes, and monitors water sources, use, and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal.
- Air Emissions: Supplier shall identify, manage, monitor, and responsibly control air emissions that pose an environmental risk or hazard (*e.g.*, corrosives, ozone-depleting chemicals).
- Pollution Prevention and Resource Reduction: Supplier shall take steps to reduce or eliminate waste by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling, and reusing materials.
- Material Restrictions: Supplier shall adhere to applicable laws and regulations and Verifone requirements regarding prohibition or restriction of specific substances, including labeling for recycling and disposal.
- Energy Consumption and Greenhouse Gas Emissions: In the pursuit of sustainable practices, Supplier shall commit to optimizing its operations to reduce resource consumption, including raw materials,



energy, and water. Supplier shall actively monitor, document, and strive to minimize energy usage and greenhouse gas emissions while exploring opportunities to enhance energy efficiency and transition to cleaner energy sources.

# Management System

Supplier shall implement and maintain a management system that facilitates continual compliance improvement and is designed to ensure: 1) compliance with applicable laws, regulations, and Verifone requirements applicable to Supplier; 2) conformance with the applicable standards set forth in this Supplier Code; and 3) identification and mitigation of operational risks related to this Supplier Code. The management system should include appropriate measures, such as internal audits, risk assessments, management accountability and commitment, worker training, corrective action, and recordkeeping.



# Certification & Disclosure

The below-named Supplier has diligently reviewed Verifone’s Supplier Code of Conduct and (i) Supplier agrees to comply with it, or (ii) Supplier confirms that it has its own code of conduct containing comparable or more stringent standards that are reasonable with regard to the size of Supplier’s business and Supplier’s business/industry sector and Supplier will comply with the principles set out in its own code of conduct at all times in relation to its business dealings with Verifone.

Supplier Name: \_\_\_\_\_  
Date: \_\_\_\_\_  
Name of Authorized Representative: \_\_\_\_\_  
Signature of Authorized Representative: \_\_\_\_\_

Verifone appreciates Supplier’s cooperation and shared commitment to ethical business practices. Please direct any questions about the Supplier Code to [operational.procurement@verifone.com](mailto:operational.procurement@verifone.com) or VeriFone, Inc., c/o Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808, USA.

This Supplier Code does not confer, nor shall it be deemed to confer, any third-party beneficiary rights or any other right to any third party. For example, no worker of any Supplier shall have any right against Verifone by virtue of Supplier’s acceptance or certification of the Supplier Code, nor shall any such worker have any right to cause Verifone to enforce any provision of the Supplier Code. Verifone expressly reserves all enforcement decisions and actions with respect to the Supplier Code in Verifone’s sole discretion.

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